

Kristina Allen Reliford

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VIA ECF and E-Mail (chambersnysdseibel@nysd.uscourts.gov)

July 6, 2021

Honorable Cathy Seibel
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

RE: ***U.S. ex rel. Integra Med Analytics LLC v. Isaac Laufer et al.***;
Case No. 7:17-cv-09424 (CS)

Dear Judge Seibel,

Our firm represents Excel at Woodbury for Rehabilitation and Nursing LLC, East Rockaway Center LLC d/b/a Lynbrook Restorative Therapy and Nursing, Oasis Rehabilitation and Nursing LLC, Suffolk Restorative Therapy & Nursing LLC d/b/a Momentum at South Bay for Rehabilitation and Nursing, and Treetops Rehabilitation & Care Center LLC d/b/a North Westchester Restorative Therapy and Nursing Center (the "Five Facilities"), five of the defendants in the above-referenced action.

We write to request that all Defendants' time to respond to the complaint-in-intervention (Doc. No. 13) be extended to and including August 10, 2021. Most but not all of the Defendants in the action have waived service. The Defendants request an extension to uniformly extend and consolidate their deadlines to respond to the complaint, consistent with those defendants that waived service. In addition, several of the Defendants still need time to retain counsel, and counsel for Defendants need to meet with their clients and assess the proper response to the claims alleged in the complaint-in-intervention.

The deadline for response is currently July 6, 2021 for Monclair Care Center, Inc. d/b/a Emerge Nursing and Rehabilitation; Quantum Rehabilitation and Nursing LLC; and Surge Rehabilitation and Nursing LLC. The deadline for response is currently August 9, 2021 for the Five Facilities, as well as defendants Forest Manor Care Center, Inc. d/b/a Glen Cove Center for Nursing; Long Island Care Center Inc.; Paragon Management SNF LLC; Sutton Park Center for Nursing & Rehabilitation, LLC; and Issac Laufer. The deadline for response is currently August 10, 2021 for defendant Tami Whitney.

We request that the Court set a uniform deadline of August 10, 2021 for all defendants to respond to the complaint-in-intervention. Undersigned counsel has obtained consent for this request from the government, counsel for defendants that have obtained counsel, and representatives of defendants still seeking to obtain counsel (the latter two groups and the Five Facilities are collectively referred to herein as "Defendants"). This is Defendants' first request for an extension. Thank you for your consideration.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Kristina Reliford", with a large, stylized loop at the end.

Kristina Allen Reliford

cc: Jack W. Selden, Esq.
J. Bradley Robertson, Esq.
Jonathan H. Ferry, Esq.
Lyndsay E. Medlin, Esq.